IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE: '318 PATENT INFRINGEMENT LITIGATION	))))	C.A. No. 05-356-KAJ (consolidated)

NOTICE OF DEPOSITION UNDER FED. R. CIV. P. 30(b)(6) TO MYLAN PHARMACEUTICALS INC. AND MYLAN LABORATORIES, INC.

PLEASE TAKE NOTICE that on March 17, 2006 commencing at 9:00 a.m., at the offices of Covington & Burling, 1201 Pennsylvania Avenue, N.W., Washington, D.C. 20004, Plaintiffs Janssen Pharmaceutica N.V., Janssen, L.P. and Synaptech, Inc. (collectively, "Plaintiffs" or "Janssen") will take the deposition upon oral examination of Defendants Mylan Pharmaceuticals Inc. and Mylan Laboratories Inc. (collectively, "Mylan") pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure. This deposition upon oral examination will be conducted before an officer authorized to administer oaths and will be recorded by stenographic and videographic means.

Plaintiffs serve this Notice without waiver of its objections to the deficiencies in Mylan's document production and other discovery responses concerning the subject matter of the instant Notice, and reserve the right to continue this deposition as necessary in light of any subsequent document production by Mylan.

Plaintiffs will take this deposition upon oral examination through one or more officers, directors, managing agents or other persons designated by Mylan pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure as the person(s) knowledgeable to testify on Mylan's behalf concerning the topics identified in Schedule A. Mylan is requested to provide counsel for Plaintiffs with the identity of the individual(s) who will testify regarding each

topic at least one week in advance of the deposition. The deposition will continue from day to day until completed with such adjournments as to time and place as may be necessary. You are invited to attend and examine the witness(es).

ASHBY & GEDDES

/s/ Lauren E. Maguire

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Dated: February 21, 2006

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SCHEDULE A

Definitions

1. As used herein, "Mylan" shall mean Defendants Mylan Pharmaceuticals Inc. and Mylan Laboratories Inc. and all of Mylan's corporate parents, corporate predecessors and past or present subsidiaries, affiliates, divisions, departments, officers, directors, principals, agents and employees.

2. As used herein, "Mylan's ANDA" shall mean Mylan's Abbreviated New Drug Application Number 77-590.

3. As used herein, "the Generic Product" shall mean the proposed generic galantamine product that is the subject of Mylan's ANDA.

4. As used herein, "the '318 patent" shall mean United States Patent No. 4,663,318.

5. As used herein, "document" shall have the full meaning ascribed to it by the Federal Rules of Civil Procedure and shall include any means for retaining information.

6. As used herein, "FDA" shall mean the United States Food and Drug Administration.

7. "Person" and "persons" mean any natural person and any business, legal, corporate, or governmental entity, association, or organization.

8. "Alzheimer's Disease" means any diagnosis, illness, or ailment described as being of the Alzheimer's type, including without limitation Senile Dementia of the Alzheimer's Type, Alzheimer's Dementia, and/or Alzheimer's Disease.

9. "Galantamine" includes without limitation galantamine, galanthamine, and any salt of galatamine, such as galantamine hydrobromide.

Topics of Examination

1. The dates and circumstances of any analysis, discussion, or evaluation of the '318 patent conducted by or on behalf of Mylan, including but not limited to identification of all individuals involved.

2. Documents, laboratory notes, or minutes, of any analysis, discussion, or evaluation of the '318 patent conducted by or on behalf of Mylan.

3. The factual and legal bases for Mylan's First Defense (noninfringement).

4. The factual and legal bases for Mylan's Sixth Defense (failure to state a willful infringement claim).

5. The factual and legal bases for Mylan's First Claim for Relief (declaratory judgment of patent non-infringement) according to its proof elements, including an element-by-element comparison of each asserted claim of the '318 patent to the use of the Generic Product.

6. The identity and location of documents and things concerning the foregoing topics.

7. Persons knowledgeable about the subject matter of the foregoing topics.

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of February, 2006, the attached **NOTICE OF DEPOSITION UNDER FED. R. CIV. P. 30(b)(6) TO MYLAN PHARMACEUTICALS INC. AND MYLAN LABORATORIES, INC.** was served upon the below-named counsel of record at the address and in the manner indicated:

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/s/ Lauren E. Maguire

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